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Attorney for Plaintiffs

IN THE UNITED STATES DISTRICT COURT  
 FOR THE  
 NORTHERN MARIANA ISLANDS

LI YING HUA, LI ZHENG ZHE and XU JING JI, ) CASE NO. CV 05-0019

Plaintiffs, )

vs. )

JUNG JIN CORPORATION, a CNMI corporation,  
 ASIA ENTERPRISES, INC., a CNMI corporation,  
 PARK HWA SUN and KIM HANG KWON,

Defendants. )

APPLICATION FOR APPROVAL OF  
 SALE OF POKER MACHINES AND  
 POKER RELATED EQUIPMENT

Date: None Requested  
 Time: None Requested  
 Judge: Hon. Alex R. Munson, Chief Judge

Plaintiffs, by and through their undersigned attorney of record, hereby file this Application pursuant to Fed. R. Civ. P. 69(a) and Title 7, Sections 4205 of the Commonwealth Code (2000) for Court approval of the sale of Defendants' poker machines and poker related equipment seized by the United States Marshal pursuant to an Amended Order in Aid of Judgment issued by the Court on December 7, 2006.

On December 28, 2006, the Court issued a Second Order in Aid of Judgment ordering, *inter alia*, that the undersigned was authorized to sell, with Court approval, Defendants' poker machines and related equipment and accessories taken into custody by the United States Marshal, the custody of which was transferred by the United States Marshal to the undersigned.

After several months of seeking interested buyers for the poker machines, a sale of the

1 equipment looked doubtful. There is apparently a large surplus of old, unlicensed poker machines  
2 in the Commonwealth. Potential buyers informed the undersigned when inspecting the machines  
3 for sale that only about 13 of the machines had any operation value with the remaining 24 machines  
4 good only for parts. Many of the machines were missing vital equipment including motherboards  
5 and bill changers. All of the machines are in need of repairs. The rest of the equipment and  
6 accessories would have to be cleaned and restored to good working condition and appearance at an  
7 additional cost to any potential purchaser.

8 All of the seized poker machines and the related equipment and accessories are being stored  
9 at Defendants' seized real property in Susupe, Saipan. With the transfer of possession of the Susupe  
10 property eminent (on May 5, 2007, the undersigned sold at public auction the Susupe lot), the  
11 undersigned approached, again, individuals that had previously indicated interest in purchasing the  
12 entire lot of machines, and all machine parts, equipment and related accessories such as stools and  
13 machine stands. One of the individuals was willing to purchase and take possession of all of the  
14 machines, equipment and accessories for \$2,000.00. This is the highest offer to date received by the  
15 undersigned for any or all of the poker machines.

16 Given the cost it would take to move and to store the items while continuing to solicit  
17 additional interested buyers, and given the likelihood of finding another buyer for the entire lot of  
18 machines willing to pay more than \$2,000.00, the undersigned believes that \$2,000.00 is the highest  
19 and best price that Plaintiffs can reasonably obtain for the property in its present state at the present  
20 time. There is no relationship between the undersigned and the proposed purchaser, Mr. Choi Seung  
21 San, with mailing address PMB 25, P.O. Box 10,003, Saipan, MP 96950. There is no other reason for  
22 the undersigned to believe that this proposed sale is not an arm's length transaction. The  
23 undersigned will inform the Department of Finance of the transfer of the poker machines (by serial  
24 number) upon court approval and consummation of the sale.  
25  
26  
27

1 Plaintiffs waive any hearing on this application and respectfully request an order of approval  
2 at the Court's earliest convenience. This Application is accompanied by an *ex parte* motion to  
3 shorten time.

4  
5 Respectfully submitted this 14<sup>th</sup> day of May, 2007.

6  
7 /s/ Mark B. Hanson

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 MARK B. HANSON

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17 Attorney for Plaintiffs  
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was deposited in the United States Post Office,  
first class mail, postage prepaid, addressed to the following:

Jung Jin Corporation  
P.O. Box 503428  
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Park Hwa Sun  
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Kim Hang Kwon  
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I further certify that the following were served with a copy of the foregoing via the Court's  
electronic case filing system:

Richard W. Pierce  
RICHARD W. PIERCE LAW OFFICE, LLC  
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Saipan, Mariana Islands 96950

DATED: March 27, 2007

/s/ Mark B. Hanson

MARK B. HANSON